

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

MICHAEL P. AND SHELLIE GILMOR,)
)
Plaintiffs,)
)
v.) Case No. 4:10-CV-00189-HFS
)
PREFERRED CREDIT CORPORATION,)
et al.,)
)
Defendants.)

**DEFENDANT UNITED MORTGAGE CB, LLC'S
MOTION FOR ENLARGEMENT OF TIME TO SERVE
OBJECTIONS AND RESPONSES TO WRITTEN DISCOVERY**

COMES NOW defendant United Mortgage CB, LLC, ("Defendant" or "UMCB"), by and through counsel, and pursuant to Fed.R.Civ.P.6(b), hereby moves for additional time in which to serve its responses to plaintiffs' first set of interrogatories and document requests. In support of its motion, defendant states as follows:

SUGGESTIONS IN SUPPORT

1. Plaintiffs first served written discovery upon Defendant UMCB on December 3, 2010.
2. UMCB's responses to the plaintiffs' first set of discovery requests are currently due on January 6, 2011.
3. UMCB needs an enlargement of time to serve its written responses. Plaintiffs' discovery is broad in scope, both in terms of its subject matter and time (by its instruction covering over fifteen years). Due to the absences of client contacts during the month of December, the holidays, the breadth of the discovery and counsel's involvement on discovery

and briefing issues in this case and others due at or about this same time, UMCB needs additional time to complete its responses.

4. Defendant UMCB requests that the Court grant it an enlargement and permit it to serve written responses (answers, responses and/or objections) by January 18, 2011.

5. This motion for an enlargement of time is made in good faith and not for the purpose of delay.

6. No prior requests for additional time have been made. UMCB believes this motion for an enlargement of time will not unfairly prejudice plaintiffs or any other party to this action.

WHEREFORE, defendant United Mortgage CB, LLC, respectfully requests this Court to enlarge the time within which it may serve its responses to and including January 18, 2011.

Respectfully submitted,

MARTIN, LEIGH, LAWS & FRITZLEN, P.C.

/s/ Richard L. Martin

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 6th day of January, 2011.

/s/ Richard L. Martin

Attorney for Defendant United Mortgage CB LLC